

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD and
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Case No. 2:23-CV-00103-JRG-RSP

**DECLARATION OF JONATHAN B. BRIGHT IN SUPPORT OF
SAMSUNG’S RESPONSIVE CLAIM CONSTRUCTION BRIEF**

I, Jonathan B. Bright, hereby declare under the penalty of perjury as follows: I am a Principal at Fish & Richardson P.C., counsel for Defendants Samsung Electronics Co. Ltd. (“SEC”) and Samsung Electronics America, Inc. (“SEA”) (collectively “Samsung”). I am a member of the Bar of the State of Georgia and am admitted to this Court. I have personal knowledge of the matters stated in this declaration and would testify to them if called upon to do so.

1. Attached as Exhibit A is a true and correct copy of excerpts of Newton’s Telecom Dictionary, 24th ed. (2008).

2. Attached as Exhibit B is a true and correct copy of excerpts of the Dictionary of Science and Technology, 2nd ed. (2007).

3. Attached as Exhibit C is a true and correct copy of excerpts of the Dictionary of Computer and Internet Terms, 10th ed. (2009).

4. Attached as Exhibit D is a true and correct copy of excerpts of Headwater’s December 15, 2015 Amended Infringement Contentions regarding the ’733 Patent.

5. Attached as Exhibit E is a true and correct copy of excerpts of the prosecution history of U.S. Patent Application No. 14/667,353.

6. Attached as Exhibit F is a true and correct copy of excerpts from Samsung SDS Enterprise Mobility Management Installation Guide, dated January 2023.

/s/Jonathan B. Bright

Jonathan B. Bright